

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JOSEPH ROGERS, DEBRA JONES
STEVENSON, TAYLOR ARMIGER, on behalf
of themselves and all others similarly situated,

Plaintiff,

VS.

ASSURANCE IQ, LLC,

Defendant.

Case No. 2:21-cv-00823-TL

**STIPULATED MOTION TO STAY
PROCEEDINGS**

**NOTE ON MOTION CALENDAR:
July 25, 2023**

Plaintiffs Joseph Rogers, Debra Jones Stevenson, and Taylor Armiger (“Plaintiffs”) and Defendant Assurance IQ, LLC (“Defendant”) (together “the Parties) stipulate to a stay of proceedings pending their mediation of this matter and respectfully request the Court to enter the Proposed Order below:

WHEREAS, Plaintiffs assert claims against Defendant under the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227, on behalf of a putative nationwide class (See Doc. 70);

WHEREAS, the Parties held a productive mediation session before Robert A. Meyer of JAMS on July 14, 2023 to negotiate a resolution of these claims on a classwide basis;

1 WHEREAS, the Parties have scheduled a second mediation for September 15, 2023
2 before the same mediator to continue their negotiations;

3 WHEREAS, pending before the Court are the Parties' separate proposals for the
4 scheduling of discovery and dispositive motions (Doc. 71) and Defendant's Motion to Dismiss
5 the Third Amended Complaint (Doc. 72);

6 WHEREAS, there is no trial date set and no other scheduled deadlines or proceedings
7 upcoming in this matter;

8 WHEREAS, the Parties have a good faith belief that they might reach an agreement at
9 the second mediation and wish to preserve resources;

10 WHEREFORE, the Parties agree and stipulate to a stay of all proceedings in this matter
11 pending the Parties' submission of a Joint Status Report on September 30, 2023 advising of the
12 outcome of their mediation.

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14 Presented By:

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14 *Attorneys for Defendant*

15 IT IS SO ORDERED.

16 Dated this 25th day of July, 2023.
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19 _____
20 Tana Lin
United States District Judge
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